

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

IN RE GOOGLE INC. COOKIE PLACEMENT  
CONSUMER PRIVACY LITIGATION

Case No. 12-MD-2358 (SLR)

**[PROPOSED] ORDER GRANTING  
MICHAEL FROHBERG AND ANDY  
WU'S MOTION FOR  
INTERVENTION AS PLAINTIFFS**

This Document Relates to:  
**All Actions**

MICHAEL FROHBERG and ANDY WU, on  
behalf of themselves and all others similarly  
situated,

Intervening Plaintiffs,

v.

MEDIA INNOVATION GROUP, LLC and  
WPP PLC,

Defendants.

Before the Court is Applicants Michael Frohberg and Andy Wu's Motion for Intervention as Plaintiffs ("Motion"). Having carefully considered the Motion, and pursuant to Federal Rule of Civil Procedure 24, the Court hereby GRANTS the Motion. Subsequent filings in this matter shall bear the caption above, and Applicants Frohberg and Wu shall be permitted to participate in the above-captioned action in the same manner, and subject to the same responsibilities, as Plaintiffs William Gourley, Jose M. Bermudez, Nicholas Todd Heinrich, and Lynne Krause.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE SUE L. ROBINSON  
UNITED STATES DISTRICT JUDGE